Roanoke, VA

1/19/24

K.D. Saville

AFFIDAVIT IN SUPPORT OF APPLICATION FOR A CRIMINAL COMPLAINT

I, Mary Grace Echols, a Special Agent with the Federal Bureau of Investigation ("FBI"), being duly sworn, depose and state as follows:

I. INTRODUCTION

A. Agent Background and Experience

- 1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") assigned to the Charlottesville Resident Agency out of the Richmond Field Office. I have been employed with the FBI since November 2017. As part of my training to become a Special Agent, I received approximately 18 weeks of instruction at the FBI Academy. Since graduating from the Academy, I have received further training in federal law, including, but not limited to, violations related to Human Trafficking.
- 2. As an FBI Special Agent, I have conducted and participated in investigations for various violations to include crimes against children and human trafficking. I have training and experience in interviewing and in interrogation techniques, arrest procedures, the execution of searches, evidence review, and various other procedures and investigative methods. Through training, experience, and my participation in the subject investigation, I have become familiar with the methods used by those involved in sex trafficking to post advertisements for sexual encounters, how sex traffickers control their victims, and how profits are derived from such conduct. In general, sex trafficking is the recruitment, harboring, transportation, provision, or obtaining a person for the purposes of engaging in commercial sex acts in which the commercial sex act is induced by force, fraud, or coercion or in which the person is under the age of 18 years old. I have also become familiar with slang or coded terms used in connection with sex trafficking through reviewing of digital communications obtained through seized electronics, review of online

ads and posts, interviews with sex trafficking victims, speaking with experienced agents and investigators, and other means. Prior to becoming a Special Agent, I was assigned to the Atlanta, Georgia, FBI Office's Crimes Against Children and Human Trafficking Unit, providing tactical and administrative assistance for child sexual exploitation and human trafficking investigations.

B. Purpose of Affidavit

- 1. This affidavit is submitted in support of a complaint for the arrest of Brian Lamont Turner ("TURNER") for a violation of 18 U.S.C. § 2421(a), transportation for the purpose of prostitution (the "Target Offenses"). Under 18 U.S.C. § 2421(a), it is unlawful to cause someone to travel in interstate or foreign commerce to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense. An offense under this section occurs when (1) the defendant knowingly transported an individual in interstate commerce; and (2) the purpose of the travel was for the individual to engage in prostitution.
- 2. Based on the facts set forth below, there is probable cause to believe that between June 10, 2023 and June 19, 2023, in the Western District of Virginia and elsewhere, TURNER did knowingly cause Adult Victim 1 (hereinafter, "AV1") to travel in interstate commerce with the intent for AV1 to engage in prostitution, in violation of 18 U.S.C. § 2421(a).

C. Sources of Information

3. I have personally participated in the investigation of the offense discussed below. The statements in this Affidavit are based on my personal knowledge, information obtained from other law enforcement officers participating in this investigation, and other sources which I believe are reliable. Since this affidavit is intended to show merely that there is sufficient probable cause for the requested warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that TURNER committed a violation of 18 U.S.C. § 2421(a). Further, this affidavit reflects my

current understanding of facts relating to this investigation, but my understanding may change in the future as the investigation proceeds and new information is gathered.

II. PROBABLE CAUSE

A. Reports of Sex Trafficking by TURNER

- 4. In February 2023, the FBI initiated an investigation into Brian Lamont TURNER for sex trafficking and other criminal conduct in the Western District of Virginia. The FBI received several reports from local law enforcement agencies identifying TURNER and adult females who were suspected to be engaged in commercial sex. Additional adult females associated with TURNER have been identified from online commercial sex advertisements and interviews with witnesses. The investigation identified an account on SkiptheGames¹ registered to an email known to be used by TURNER, itsthatdrip@gmail.com.² This Gmail account was used to post advertisements with photos depicting the adult females identified by law enforcement. Since the account was created on December 2, 2022, it appears TURNER has used this account to post hundreds of commercial sex advertisements in various cities in Virginia, North Carolina, South Carolina, Maryland, and Pennsylvania. As of January 17, 2024, the most recent SkiptheGames advertisement was posted on January 17, 2024 for Charlottesville, Virginia.
- 5. Interviews with several adult females reveal that TURNER has been engaged in the Target Offense since as early as 2019. One of those adult females, Adult Victim 1 ("AV1") described meeting TURNER at a hotel in Greensboro, North Carolina in 2019 when she was about eighteen years old and addicted to heroin. At the time, TURNER told AV1 he could give her a

¹ Based on my training and experience, I know that "SkiptheGames" is a commercial sex website.

² A subsequent portion of this Affidavit describes how Turner is linked to the identified Gmail account.

better life and she could make money with him. This is consistent with other victims' statements about TURNER's recruitment tactics.

6. While AV1 was with TURNER, TURNER transported her and other adult females from Virginia to various states to include North Carolina and South Carolina to engage in commercial sex. TURNER decided which locations AV1 was advertised in and posted the commercial sex advertisements of AV1 on commercial sex website SkiptheGames.com. TURNER also made hotel reservations and paid for the hotels used to facilitate the commercial sex. Additionally, TURNER determined AV1's schedule and provided AV1 with drugs. TURNER transported AV1 in his vehicle and stayed in the parking lot or in another hotel room while AV1 saw the commercial sex customers. AV1 was required to give half of her money from the "dates" to TURNER. Based on my training and experience as an investigator, I know that sex traffickers often control the conduct of their victims by serving as the sole source of income, transportation, and narcotics, as well as remaining in close proximity to limit opportunities for the

7. Additionally, the investigation has revealed that TURNER targets female victims who have drug addictions, recruits them, and uses their drug addictions to control them. TURNER becomes the victims' source of drug supply in order to get them to follow his instructions and complete commercial sex acts. For instance, during her time with TURNER, AV1 was addicted to drugs. Throughout her time with TURNER, she continued to use heroin and began using methamphetamine and Percocet. AV1 described TURNER threatening to withhold drugs from her if she did not complete a commercial sex date. In order to prevent drug withdrawals, also known as "dopesickness" because it may involve extreme feelings of illness, AV1 completed the

sex trafficked individual to leave the situation.

³ Based on my training and experience, I know that a "date" is commonly used to refer to the exchange of one or more commercial sex acts for something of value, which is often money.

"dates" to ensure TURNER did not withhold narcotics. AV1 described that TURNER would get aggressive with her and yell at her when she was not doing what she was supposed to do. Based on my training and experience as an investigator, I know that overt threats and intimidation are also common control tactics used by sex traffickers in dealing with their victims.

8. Additionally, TURNER is known to possess a firearm and there are incidents in which he has used it to compel his victims to follow his instructions. For example, in October 2019, local law enforcement in Greenville, South Carolina arrested TURNER in possession of a firearm after he reportedly threatened Adult Victim 4 ("AV4") with a firearm in a hotel room. TURNER had forced AV4 to take commercial sex dates and would not allow her to leave the hotel room. Through witness interviews and other sources, the investigation has revealed that TURNER likely continues to carry a firearm in Virginia and when traveling to other states. Based on my training and experience as an investigator, as well as common sense, I know that an individual's possession of a firearm can cause victims to feel pressure to comply with directives even if the firearm is not overtly shown or wielded in connection with the demand by the perpetrator.

B. Recovery of TURNER's Cellphone

9. On or about July 7, 2023, TURNER left a cellphone (hereinafter, the "cellphone") at the scene of an altercation in Charleston, South Carolina. TURNER approached a vehicle with two occupants: an adult male passenger and an adult female driver. TURNER brandished a firearm and demanded the adult male passenger exit the vehicle. TURNER then entered the vehicle and drove away with the adult female. The abandoned cellphone was provided to the local law enforcement agency and later transferred to the FBI's custody. A review of the cellphone confirmed that TURNER used the SkiptheGames account associated with the email address itsthatdrip@gmail.com to post commercial sex advertisements online. Specifically, TURNER's itsthatdrip@gmail.com email address was logged into the Gmail application on the cellphone,

which is consistent with TURNER's recent use of the Gmail account, cellphone, and

SkiptheGames.

10. Based on your affiant's review of the cellphone, TURNER controlled all or almost

all aspects of arranging a date. He created the commercial sex advertisements, communicated with

the customers, and scheduled the dates. For instance, there were numerous photos of women,

including AV1, within TURNER's cellphone that are identical to the photos used in the

advertisements on SkiptheGames. TURNER's digital possession of these photos are consistent

with TURNER using the images to create the ads.

11. Additionally, numerous TextNow and Textfree⁴ message threads on the cell phone

are conversations between TURNER and individuals responding to advertisements. In these

messages, TURNER and the customers discuss specifics of the dates, including how much it will

cost and where to meet the victims. TURNER's role in arranging these aspects of a "date" are

consist with his control over and profit from the encounters.

12. Furthermore, your affiant observed message threads between TURNER and

identified adult female victims, in which TURNER provided instructions and information about

the dates. For example, in messages dated on or about June 7, 2023, between TURNER and an

adult female victim (hereinafter, "AV3"), TURNER tells AV3, "I'm letting u know u got one" and

says "140qv." In messages dated June 8, 2023, TURNER tells AV3, "Ready got an outcall... for

u" and instructs AV3, "Come on down so we can go up there...only like 5 mins away." Later that

⁴ TextNow and Textfree are free text messaging platforms that allow the user to create new cell phone numbers. Based on my training and experience, it is common for traffickers to use these applications so they can frequently change the cellphone numbers they use to communicate with commercial sex customers to avoid detection of law enforcement, interactions with problematic sex "customers", and/or make it more for victims to be contacted or located.

⁵ Based on my training and experience, a "qv" refers to a "quick visit" and is often used in reference to a type of commercial sex date.

day, TURNER tells AV3, "U got a hr play⁶ be here in 15 mins" and tells AV3 the age and race of

the customer. TURNER tells AV3 that he was giving the customer the room number and tells

AV3 when the date arrived by stating, "He about to pull up," and "Open door." Based on my

training and experience, it is common for a trafficker to be the primary person to communicate

with the customers, schedule the dates, and retain the profit derived therefrom.

C. **Analysis of Interstate Travel**

13. Your affiant reviewed subpoena records, the cellphone, and SkiptheGames records

to summarize the interstate travel for TURNER, AV1, and AV3 for the purpose of engaging in

commercial sex. TURNER's activity for the time period June 9, 2023 through June 20, 2023 is

summarized below.

On June 9 and 10, 2023, TURNER posted advertisements of AV1 and AV3 on 14.

SkiptheGames for Charlottesville and Lynchburg from an Internet Protocol "IP" address that

resolves back to Lynchburg, Virginia. In a text dated June 9, 2023 (Friday), TURNER stated that

he was traveling to North Carolina from Saturday to Monday. Based on my review of subpoenaed

records and messages, it appears TURNER has a "circuit" wherein he travels across various states

with his victims for purposes of engaging in sex trafficking activities.

In a text message dated on or about June 10, 2023, TURNER stated that he would 15.

be in North Carolina for a few days. According to Priceline⁷ records, TURNER made a hotel

reservation at the Cambia Hotel in Raleigh-Durham on June 11, 2023. Between June 11 through

June 14, 2023, TURNER posted advertisements on SkiptheGames for Raleigh and Durham, North

Carolina. According to Priceline records, TURNER booked a reservation at the Red Roof Inn in

⁶ Based on my training and experience, I know that a "play" is commonly used to refer to a customer of commercial sex.

⁷ Priceline.com is an online travel agency used to find discount rates for travel-related purchases, such as

hotel rooms.

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Raleigh, Southwest Cary for June 13 and 14, 2023. The IP addresses for the Priceline reservation

and the SkiptheGames advertisements resolve to the area of Cary, North Carolina. On June 14,

2023, TURNER sent a picture of the Red Roof Inn card in a text message. TURNER's Cashapp

account has transactions on June 14, 2023 from an IP address near Cary, North Carolina.

16. On June 15 and June 16, 2023, TURNER posted advertisements on SkiptheGames

for AV1 and AV3 in Myrtle Beach, South Carolina. In a text dated on or about June 15, 2023,

TURNER stated that he was on the way to South Carolina. According to Priceline records,

TURNER made a reservation at the Sun N Sand Resort in Myrtle Beach, South Carolina on June

15, 2023.

17. In a text message dated on or about June 16, 2023, TURNER stated that he was

traveling to Greensboro, North Carolina that night. Between June 16 and 17, 2023, TURNER

posted advertisements on SkiptheGames for Greensboro, North Carolina. On June 16, 2023,

TURNER made a reservation through Priceline at the Howard Johnson by Wyndham in

Greensboro, North Carolina and on June 17, 2023, TURNER made reservations at the Baymont

by Wyndham and the Days Inn in Greensboro, North Carolina.

18. In a text message dated on or about June 18, 2023, TURNER stated that he was

driving back to Virginia the next day. Between June 18 and 19, 2023, TURNER posted

advertisements on SkiptheGames in Charlottesville, Virginia from an IP address that resolves back

to Charlottesville, Virginia. TURNER's Cashapp account reveals transactions on June 19, 2023,

from an IP address resolving to Charlottesville, Virginia.

19. Based on my training and experience, I know that an IP address is a unique

identifying number assigned to every device connected to the internet. This numerical label can

often be used to identify the location of the individual connecting to the internet.

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20. Based on the above information, I submit there is probable cause to conclude

TURNER transported AV1 and AV3 from Virginia to North Carolina and South Carolina for the

purpose of engaging in commercial sex. As described, TURNER posted advertisements on

SkiptheGames for AV1 and AV3 and booked the hotel rooms in various cities, which are typically

used to conduct "dates," also known as commercial sex encounters.

III. **CONCLUSION**

Based on the foregoing, there is probable cause to believe that from June 10, 2023 21.

through June 19, 2023, Brian Lamont Turner committed the offense of transportation for the

purpose of prostitution, in violation of 18 U.S.C. § 2421(a).

Respectfully submitted,

MARY ECHOLS

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Special Agent

Federal Bureau of Investigation

Received by reliable electronic means and sworn and attested to by telephone on

this 19th day of January 2024.

C. KAILANI MEMMER

UNITED STATES MAGISTRATE JUDGE